To: Peronard, Paul[Peronard.Paul@epa.gov]
From: Roberts, Kris D.
Sent: Tue 8/12/2014 9:47:32 PM
Subject: RE: Feedback: 1. Current Sediment Sampling Plan 2. Future Sediment Characterization 3. ND Course of Action (UNCLASSIFIED)

Thanks Paul. You might not be aware that the COE does not have a discharge permit for their pump system, and doesn't need one. I don't think Paul or Will know that, but someone up that line should. There is no permit needed for their type of discharge, so that question doesn't exist. I just found that out this morning. Oh, for knowing the right questions to ask of the right people (:>).
Kris

-----Original Message-----
From: Peronard, Paul [mailto:Peronard.Paul@epa.gov]
Sent: Tuesday, August 12, 2014 3:01 PM
To: Roberts, Kris D.; Gouger, Timothy P NWO (First Responder); Lindquist, Todd J NWO
Cc: Harlon, William D III NWO; Buechler, Casey R NWO; Spooner, Wade D NWO; Keller, Jeffrey E NWO; Jeff LaRock; Glatt, Dave D.; Rockeman, Karl H.
Subject: RE: Feedback: 1. Current Sediment Sampling Plan 2. Future Sediment Characterization 3. ND Course of Action (UNCLASSIFIED)

Hey All,

From my standpoint I think the goals of the sampling effort for the Red River Supply incident are fairly clear. To determine the nature of the long-term impact (if any) that resulted from the fire and its aftermath. We all know that water quality took a hit from the fire-water that was lost to the LMRC during the course of the event. It is not clear if the fire has resulted in any significant deposition of contaminated sediments into the LMRC. From an appearance standpoint most of the sediment I see appears more like washout from our earthen berms than fire residue, and the Garner crews are preparing to remove that. Nonetheless, if we see evidence of material being washed into the LMRC we should follow up on it.

But after spending a couple of weeks up here it struck me that the incident at Red River Supply was only a part of the picture of what is going on here. There are certainly a multitude of potential inputs from residential, agricultural, and industrial sources in the area that flow into the storm water/flood control system that the US ACE operates. Hence, the need for the "robust sediment characterization." My notion would be to go back to Denver and develop a sampling plan, share it amongst the parties for comments, and then execute it this Fall. If nothing else, the data from this sampling should provide a baseline for the sediment present in the system.

As to item 3 in Tim's e-mail, I think it is premature to talk about potential response actions (regulatory or otherwise) until we have data back in hand. That said, I think it is fair for Tim to expect some level of commitment if the data suggest there is an on-going problem. For example, if the sediment in area 3 of the LMRC turns out to be chalk full of PCBs, pesticides, and whatnot the EPA would be willing to help with a remediation effort. I frankly doubt that would be needed, but I could see the possibility for the need for some way to monitor and/or control a little better what gets discharged into the LMRC, or some other more modest steps. Regardless, I think discussion of next steps would be better served by having better information.

Paul

-----Original Message-----
From: Roberts, Kris D. [mailto:kroberts@nd.gov]
Sent: Tuesday, August 12, 2014 12:36 PM
To: Gouger, Timothy P NWO (First Responder); Peronard, Paul; Lindquist, Todd J NWO
Cc: Harlon, William D III NWO; Buechler, Casey R NWO; Spooner, Wade D NWO; Keller, Jeffrey E

NWO; Jeff LaRock; dglatt@nd.gov; Rockeman, Karl H.
Subject: RE: Feedback: 1. Current Sediment Sampling Plan 2. Future Sediment Characterization 3. ND Course of Action (UNCLASSIFIED)

All:
I am in agreement with item 1, except that in 1c it should read samples, as we agreed on a 50 foot grid sampling along the drainage, with composite sampling within each 50 foot segment.

In regard to item 3. The department has no objection to the "robust sediment characterization" that is requested of US EPA in item 2. The involved parties will review the resulting data. We are, however somewhat confused as to what the objective of the project is, as it's purpose is not clearly defined.

Kris Roberts
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-----Original Message-----
From: Gouger, Timothy P NWO (First Responder) [mailto:Timothy.P.Gouger@usace.army.mil]
Sent: Saturday, August 09, 2014 11:10 AM
To: Peronard, Paul; Roberts, Kris D.; Lindquist, Todd J NWO
Cc: Harlon, William D III NWO; Buechler, Casey R NWO; Spooner, Wade D NWO; Keller, Jeffrey E NWO; Jeff LaRock
Subject: Feedback: 1. Current Sediment Sampling Plan 2. Future Sediment Characterization 3. ND Course of Action (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Paul, kris, and Todd,

1. After review of the latest submitted version of the sampling plan that addresses sediments (see attached), there is much consistency between the plan and the current approach, which includes the following:

a. Collect composite samples on Red River property where runoff pooled from the fire suppression activities

b. Collect composite samples from two storm water inlets, if sediment is available for testing, because these inlets may have received surface water discharge from fire suppression (a earthen berm was constructed around them to prevent flow into them during fire suppression).

c. Collect composite sample from drainage ditch along most southern building as this ditch received surface drainage during fire suppression.

d. Collect composite sample from culvert in southeastern corner of property as this culvert discharged

fire suppression water to the creek.

e. Run analytical parameters described in the sampling plan, which are the same as the analysis performed to date.

f. After constituents of concern are identified from the analysis, address sediment sampling needs, as this will better link the chemical of concern released in the fire to sediment impacts related to the fire.

2. Paul, I understand from our conversations, that US EPA has the ability to perform robust sediment characterization in the relief well channel and possibly in the surrounding areas (e.g. creek channel upstream from Williston WWTP through pump station and creek channel upstream from Corps owned property). Please confirm that we that this can be done and what action items from USACE to accomplish as much.

3. Kris, I understand that, after characterization, an assessment will be made of impacts. If action is warranted, the State of North Dakota will work with industry and other jurisdictions to address concerns for corrective action. Please confirm.

Regards

Timothy P. Gouger, PE
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Classification: UNCLASSIFIED
Caveats: NONE